## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION RECEIVED

ELAINE COLEY,	2007 APR 10 ₱ 1:54
Plaintiff,	DEBRA P. HACKETT, CLK U.S. DISTRICT COURT HIDDLE DISTRICT ALA
vs.	) CIVIL ACTION NO : 2-06cv378- ) WKW
ALABAMA MEDICAID AGENCY,	)
Defendant.	

## **MOTION FOR EXTENSION**

Comes now the pro se plaintiff, Elaine M. Coley, and request this Court for an extension of fourteen (14) days to response to the motion for summary judgment submitted by the defendant in this case. The plaintiff shows unto this Court the following grounds in support of the motion for extension.

- 1. The defendant has requested and has been granted one extension to file its motion for summary judgment.
- 2. After the defendant had been granted an extension, it filed the motion for summary judgment accompanied by a 58 page brief, as well as a voluminous array of exhibits in support of the motion.
- 3. The plaintiff is pro se and has not had sufficient time to draft a meaningful response to the defendant's motion for summary judgment.
- 4. A short extension would not unduly delay the court's ruling on the defendant's motion for summary judgment. Nor will a grant of this motion prejudice the rights of the defendant.
  - 5. Before filing this motion, the plaintiff contacted the defendant's counsel, who

does not object to the granting of the motion.

6. This motion is not submitted to harass or to cause delay the disposition of this case.

Therefore, the plaintiff requests that this Court grant her an extension to respond to the defendant's motion for summary judgment.

Respectfully submitted,

Elaine M. Coley, Pro Se

## CERTIFICATE OF SERVICE

I hereby certify that I have this 10<sup>th</sup> day of April 2007, filed a copy of this document with the Clerk of the Court, who will serve the following persons using the CM/ECF SYSTEM to perfect service.

Mark D. Wiklerson, Esq. Amanda C. Carter, Esq. 405 South Hull Street Montgomery, AL 36104 mark@wilkersonbryan.com Amanda@wilkersonbryan.com

## PLAINTIFF'S ADDRESS AND TELEPHONE

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